

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

JACQUELINE MEKHAIL,

Case No. 23-cv-00440 (KMM/TNL)

*individually, and on behalf of
those similarly situated,*

Plaintiff,

v.

NORTH MEMORIAL HEALTH CARE,

d/b/a North Memorial Health,

Defendant.

**JOINT STIPULATION AND
MOTION FOR AN EXTENSION OF
TIME FOR THE PARTIES TO FILE
A STIPULATED ESI DISCOVERY
PLAN**

Plaintiff Jacqueline Mekhail, individually, and on behalf of those similarly situated (“Plaintiff”), and Defendant North Memorial Health Care (“Defendant”) (together, the “Parties”), by and through their respective counsel, move the Court for an extension of the deadline to jointly file their stipulated ESI Discovery Plan. The Parties stipulate as follows:

WHEREAS, on June 13, 2024, the Court entered a Pretrial Scheduling Order (Docket No. 63);

WHEREAS, the Order directed the Parties to jointly file a proposed stipulated Protective Order and stipulated ESI Discovery Plan on or before June 27, 2024 (*Id.* §§ 1(g), 2(a));

WHEREAS, the Parties have been working together to come to agreement upon both documents;

WHEREAS, the Parties have or will file the proposed stipulated Protective Order without any disputes for the Court to resolve on June 27, 2024;

WHEREAS, Defendant respectfully submits that good cause exists for the requested extension because Defendant's counsel requires additional time to review the proposed ESI Discovery Plan due to the complex technological nature of the case related to Defendant's website that presents ESI issues that are different from most cases;

WHEREAS, the Parties believe that an extension to July 11, 2024 will allow them sufficient time to finish preparing a stipulated ESI Discovery Plan while also avoiding conflicts with the upcoming Federal holiday;

WHEREAS, the Parties believe that the requested extension will not affect any other deadlines or matters in this Action; and

WHEREAS, the Parties have conferred and agree to the requested extension.

THEREFORE, the Parties respectfully request that the Court grant their joint motion to extend the deadline to jointly file their stipulated ESI Discovery Plan through and including July 11, 2024.

Dated: June 27, 2024

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Dated: June 27, 2024

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